

Jonathan L. Flaxer, Esq.
S. Preston Ricardo, Esq.
GOLENBOCK EISEMAN ASSOR BELL & PESKOE LLP
437 Madison Avenue
New York, New York 10022
Telephone: (212) 907-7300
Facsimile: (212) 754-0330

and

Alexander H. Schmidt, Esq.
Malcolm T. Brown, Esq.
WOLF HALDENSTEIN ADLER FREEMAN & HERZ LLP
270 Madison Avenue
New York, New York 10016
Telephone: (212) 545-4600
Facsimile: (212) 545-4653

*Counsel for Dr. Steven Groman, Robin DeLuco,
Elizabeth Y. Grumet, ABC Flooring, Inc., Marcus
Sullivan, Katelyn Saxson, Amy C. Clinton, and
Allison C. Clinton, each individually and as a
class representative on behalf of all similarly
situated persons*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X		
In re	:	Chapter 11
	:	
MOTORS LIQUIDATION COMPANY, et al.,	:	Case No.: 09-50026 (REG)
f/k/a General Motors Corp., et al.,	:	
	:	
Debtors.	:	(Jointly Administered)
-----X		

**NOTICE OF APPEARANCE AND
REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that, pursuant to Rule 9019(b) of the Federal Rules of
Bankruptcy Procedure (the “**Bankruptcy Rules**”) and section 1109(b) of title 11 of the
United States Code, 11 U.S.C. §§ 101, *et seq.* (the “**Bankruptcy Code**”), the undersigned
hereby appear in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) as counsel

for Dr. Steven Groman, Robin DeLuco, Elizabeth Y. Grumet, ABC Flooring, Inc., Marcus Sullivan, Katelyn Saxson, Amy C. Clinton, and Allison C. Clinton, each individually and as a class representative on behalf of all similarly situated persons (collectively, the “**Plaintiffs**”), parties in interest in these Chapter 11 Cases, and, pursuant to Bankruptcy Rules 2002, 3017(a) and 9007, hereby request that all notices given or required to be given and all papers and pleadings served or required to be served in these Chapter 11 Cases (including all papers filed and served in all adversary proceedings in these Chapter 11 Cases, including Adversary Proceeding No. 14-01929 commenced by Plaintiffs) whether sent by the Clerk of the Court, the Debtors or their successors, or any creditor, committee, or party in interest, be given to and served upon the persons set forth below, and that such names and addresses be added to any master mailing list:

GOLENBOCK EISEMAN ASSOR BELL & PESKOE LLP
437 Madison Avenue
New York, New York 10022
Telephone: (212) 907-7300
Facsimile: (212) 754-0330
Attn: Jonathan L. Flaxer, Esq.
S. Preston Ricardo, Esq.
Email: jflaxer@golenbock.com
pricardo@golenbock.com

and

WOLF HALDENSTEIN ADLER FREEMAN & HERZ LLP
270 Madison Avenue
New York, New York 10016
Telephone: (212) 545-4600
Facsimile: (212) 545-4653
Attn: Alexander H. Schmidt, Esq.
Malcolm T. Brown, Esq.
Email: schmidt@whafh.com
brown@whafh.com

PLEASE TAKE FURTHER NOTICE that this request includes not only the notices, papers and pleadings referenced in the above-referenced Bankruptcy Rules but also, without limitation, orders on and notices of any motion, application, petition, pleading, or complaint, whether formal or informal, written or oral, transmitted or conveyed by mail, telephone, telecopy, facsimile, email, or otherwise in these Chapter 11 Cases.

PLEASE TAKE FURTHER NOTICE that neither this request for notice nor any subsequent appearance, pleading, proof of claim, or other writing or conduct shall constitute a waiver of any: (a) rights to have any and all final orders in any and all non-core matters entered only after *de novo* review by a United States District Court; (b) rights to trial by jury in any proceeding as to any and all matters so triable; (c) rights to have the reference withdrawn by the United States District Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and (d) other rights, claims, actions, defenses, setoffs, recoupments, or other matters under any agreement, law or equity.

Dated: New York, New York
May 7, 2014

**GOLENBOCK EISEMAN ASSOR
BELL & PESKOE LLP**

/s/ Jonathan L. Flaxer
Jonathan L. Flaxer, Esq.
S. Preston Ricardo, Esq.
437 Madison Avenue
New York, New York 10022
Telephone: (212) 907-7300
Facsimile: (212) 754-0330

and

**WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP**

Alexander H. Schmidt, Esq.
Malcolm T. Brown, Esq.
270 Madison Avenue

New York, NY 10016
Telephone: (212) 545-4600
Facsimile: (212) 545-4653

Counsel for Dr. Steven Groman, Robin DeLuco, Elizabeth Y. Grumet, ABC Flooring, Inc., Marcus Sullivan, Katelyn Saxson, Amy C. Clinton, and Allison C. Clinton, each individually and as a class representative on behalf of all similarly situated persons